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ROKID, INC.

**Additional Counsel on the Next Page*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JUN FU, an individual,
Plaintiff,

v.

ROKID, INC.; and DOES 1 through 25,
inclusive,
Defendants.

ROKID, INC.,
Counterclaimant,

v.

JUN FU; DOES 1-100, inclusive,
Counter-Defendants

Case No. 3:23-cv-04327-LB

**STIPULATION AND [PROPOSED
ORDER] CONTINUING THE
MEDIATION DATE AND DEADLINE**

State Complaint Filed: August 17, 2023
Removal Date: August 23, 2023
Trial Date: March 3, 2025

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8 Attorneys for Plaintiff and Counter-Defendant
9 JUN FU

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1 Pursuant to ADR Local Rule 6–5 and Civil Local Rule 7–10, Plaintiff Jun Fu (“Plaintiff”)
2 and Defendant Rokid, Inc. (“Defendant”) (collectively, “Parties”), by and through their respective
3 counsel of record, enter into the following Stipulation to Continue the Mediation Date and
4 Deadline as follows:

5 WHEREAS, on November 30, 2023, this Court held the Initial Case Management
6 Conference and further ordered that mediation occur not later than March 7, 2024 (if possible)
7 [ECF No. 19];

8 WHEREAS, on December 5, 2023, the Court’s ADR Case Administrator appointed Dana
9 Curtis to serve as the mediator in this action;

10 WHEREAS, on January 8, 2024, the Mediator and the Parties conducted the Joint Phone
11 conference pursuant to ADR Local Rule 6-2;

12 WHEREAS, on January 19, 2024, the Mediator scheduled the mediation in this matter for
13 April 25, 2024, which is after the March 7, 2024, date set in the Court’s November 30, 2023,
14 scheduling order;

15 WHEREAS, ADR Local rule 6–10(b) requires that each party “must be accompanied at
16 the Mediation by the lawyer who will be primarily responsible for handling the trial of the matter;”

17 WHEREAS, lead counsel and the “lawyer who will be primarily responsible for handling
18 the trial of the matter” for Defendant, Angel Sevilla, will be unavailable due to an actively-
19 occurring trial that is not expected to end until on or around April 30, 2024;

20 WHEREAS, the Parties are further attempting to resolve current discovery disputes
21 concerning information needed to conduct a productive mediation;

22 WHEREAS, to ensure that Parties engage in a productive mediation with all necessary
23 counsel and information, and to conserve judicial resources in the interim, the Parties request that
24 this Court extend the deadline to complete mediation to **May 30, 2024**, or a date shortly thereafter
25 on which counsel for Plaintiff, counsel for Defendant, and the Mediator are all available to conduct
26 a mediation.

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1 WHEREAS, the requested time modifications will not delay the progress of the ligation,
2 since the mediation would nonetheless be conducted before the June 27, 2024, Case Management
3 Conference.

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5 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

6 Dated: April 11, 2024

JACKSON LEWIS P.C.

7
8 By: /s/ Spencer C. Ladd
9 Angel R. Sevilla
10 Spencer C. Ladd
11 Attorneys for Defendant and
12 Counter-Claimant
13 ROKID, INC.

14 Dated: April 11, 2024

MCCORMACK LAW FIRM

15 By: /s/ Bryan J. McCormack
16 Bryan J. McCormack
17 Attorneys for Plaintiff and
18 Counter-Defendant
19 JUN FU

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21 *Counsel for Plaintiff, Jun Fu, authorized
22 submission of his e-signature on this document in
23 writing, by e-mail dated April 10, 2024, at 4:41 p.m.
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[PROPOSED] ORDER

GOOD CAUSE APPEARING, and the Parties having stipulated thereto, IT IS HEREBY
ORDERED THAT: The deadline for the parties to conduct mediation shall be extended to

_____.

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: _____

THE HON. LAUREL BEELER
UNITED STATES DISTRICT JUDGE

4886-0071-3142, v. 2